

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:

SCOTT ALLAN WRIGHT,

*Debtor*

SCOTT ALLAN WRIGHT,

*Movant,*

vs

AES/PHEAA, ASSET ACCEPTANCE LLC, CANDICA, LLC, CAPITAL ONE,  
N.A., CAVALRY PORTFOLIO SERVICES, LLC, CITIBANK, CITICORP  
TRUST BANK, COUNTY OF ALLEGHENY, CREDIT ACCEPTANCE,  
DENOVUS CORPORATION, LTD, DUQUESNE LIGHT COMPANY,  
ECAST SETTLEMENT CORPORATION, ASSIGNEE, ECMC, EQUABLE  
ASCENT FINANCIAL, LLC, FAN DISTRIBUTING, LLC, INTERNAL  
REVENUE SERVICE, JEFFERSON CAPITAL SYSTEMS LLC, J.P.  
MORGAN CHASE BANK, N.A., LVNV FUNDING LLC . M & T BANK,  
MOON AREA S.D., OCWEN LOAN SERVICING, LLC, PALISADES  
COLLECTIONS, LLC, PORTFOLIO RECOVERY ASSOCIATES, LLC  
PYOD LLC, and SALLIE MAE INC. and RONDA J. WINNECOUR,  
TRUSTEE,

*Respondents*

**NOTICE OF HEARING WITH RESPONSE DEADLINE ON DEBTOR'S MOTION TO  
TRANSFER FUNDS FROM THE CLERK TO THE CHAPTER 13 TRUSTEE**

TO THE RESPONDENT(S):

You are hereby notified that the above Movant seeks an order affecting your rights and property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movant a response to the motion no later than **9/17/2012**, i.e., fourteen (14) days after the date of the service below, plus an additional three (3) days if served by mail, in accordance with the Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the Presiding Judge as found on the Judge's web page at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

You should take this to your lawyer at once.

A hearing will be held on **9/28/2012 AT 10:00 A.M.** before Judge Judith K. Fitzgerald in Courtroom "A", 54th Floor, US Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Only a limited time of 15 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Court. An order granting the relief sought may be entered and the hearing may not be held if you do not timely file and serve a written response.

/s/ Michael S. Geisler

DATED: 8/29/2012

**MICHAEL S. GEISLER, ESQUIRE**

Attorney for Movant

Pa. I.D. No. 39414

400 Penn Center Blvd., Suite 755

Pittsburgh, PA 15235

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E-Mail: [m.s.geisler@att.net](mailto:m.s.geisler@att.net)

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**SCOTT ALLAN WRIGHT,**  
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PYOD LLC, and SALLIE MAE INC. and RONDA J. WINNECOUR,  
TRUSTEE,**

*Respondents*

: Chapter 13  
:  
: Case No. **11-24340-JKF**  
:  
: Doc. No. \_\_\_\_\_

**DEBTOR'S MOTION TO TRANSFER FUNDS FROM THE CLERK TO THE**  
**CHAPTER 13 TRUSTEE**

AND NOW comes the Debtor, SCOTT ALLAN WRIGHT, by and through his Attorney,  
MICHAEL S. GEISLER, ESQUIRE, and files this Motion, of which the following is a statement:

1. Movant is the Debtor.
2. The Debtor filed a Chapter 13 Petition on 7/10/2011.
3. On 4/18/2012, the case was dismissed by this Court for the failure to file an Amended Plan.
4. On 4/24/2012, the Trustee sent the sum of \$9,025.45 to the Clerk.

5. The dismissal has been vacated and the case reopened.

WHEREFORE, the Debtor prays that this Court enter an order directing the Clerk to transfer the sum of \$9,025.45 to the Trustee.

DATED: 8/29/2012

/s/ Michael S. Geisler

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**MICHAEL S. GEISLER, ESQUIRE**

Attorney for Movant

Pa. I.D. No. 39414

400 Penn Center Blvd., Suite 755

Pittsburgh, PA 15235

Tele: (412) 372-2820

E-Mail: m.s.geisler@att.net

J.

**CERTIFICATE OF SERVICE**

I, MICHAEL S. GEISLER, ESQUIRE, Attorney for the Debtor, hereby certify that I have served a true and correct copy of the within Motion and the Notice of Hearing upon the following by First Class Mail, postage prepaid unless other wise indicated below:

RONDA J. WINNECOUR, TRUSTEE  
3250 US Steel Tower  
Pittsburgh, PA 15219

(BY ELECTRONIC MEANS)

AES/PHEAA  
P.O. Box 8147  
Harrisburg, PA 17105

Asset Acceptance LLC  
P.O. Box 2036  
Warren MI 48090

Candica, LLC  
c/o Weinstein and Riley, P.S.  
2001 Western Avenue, Ste 400  
Seattle, WA 98121

Capital One, N.A.  
c/o Creditors Bankruptcy Service  
P.O. Box 740933  
Dallas TX 75374

Cavalry Portfolio Services, LLC  
500 Summit Lake Drive Suite 400  
Valhalla, NY 10595-1340

Citibank  
P.O.Box 66062  
Sioux Falls, SD 57117

Citicorp Trust Bank  
P.O. Box 6042  
Sioux Falls, SD 57117-6042

County of Allegheny and  
Moon Area S.D.

(BY ELECTRONIC MEANS)

c/o Goehring Rutter & Boehm  
437 Grant St. 14th Floor  
Pittsburgh PA 15219

Credit Acceptance  
25505 West 12 Mile Rd  
Suite 3000  
Southfield, MI 48034

Denovus Corporation, Ltd  
c/o Jefferson Capital Systems LLC  
P.O. Box 7999  
Saint Cloud, MN 56302-9617

Duquesne Light Company  
c/o Bernstein Law Firm, P.C.  
Suite 2200, Gulf Tower  
Pittsburgh, PA 15219

(BY ELECTRONIC MEANS)

eCAST Settlement Corporation, assignee  
of FIA Card Services aka Bank of America  
P.O. Box 35480  
Newark, NJ 07193-5480

ECMC  
P.O. Box 75906  
St. Paul, MN 55175

Equable Ascent Financial, LLC  
c/o Recovery Management Systems Corporation  
25 SE 2nd Avenue Suite 1120  
Miami FL 33131-1605

Fan Distributing, LLC  
3300 Monroe Avenue, Suite 205  
Rochester, NY 14618

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

J.P. Morgan Chase Bank, N.A.  
P.O. Box 901032  
Ft. Worth, TX 76101-2032

Kevin P. Diskin, Esquire  
Stern & Eisenberg, LLP  
261 Old York Rd  
Suite 410  
Jenkintown, PA 19046

(BY ELECTRONIC MEANS)

LVNV Funding LLC its successors and assigns as  
assignee of American Express Bank  
Resurgent Capital Services  
P.O. Box 10587  
Greenville, SC 29603-0587

M & T Bank  
1100 Wehrle Drive  
Williamsville, NY 14221

Ocwen Loan Servicing, LLC  
Attn:Bankruptcy Department  
1661 Worthington Rd  
Suite 100  
West Palm Beach, FL 33409

Palisades Collections, LLC  
Vativ Recovery Solutions LLC, dba SMC  
As Agent For Palisades Collections, LLC  
P.O. Box 40728  
Houston, TX 77240-0728

Portfolio Recovery Associates, LLC  
P.O.Box 12914  
Norfolk, VA 23541

PYOD LLC its successors and assigns as assignee of  
NCO Group Inc.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Sallie Mae Inc. on behalf of ECMC  
Lockbox 8682  
P.O. Box 75848  
St. Paul, MN 55175

Civil Process Clerk  
The United States Attorney

633 U.S. Post Office And Courthouse  
Pittsburgh, PA 15219-1955

The Attorney General Of The United States  
Civil Division, Bankruptcy Section  
U.S. Department Of Justice  
Washington, D.C. 20530

DATED: 8/29/2012

/s/ Michael S. Geisler

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**MICHAEL S. GEISLER, ESQUIRE**

Attorney for Movant

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400 Penn Center Blvd., Suite 755

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